

EXHIBIT 1-23

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and

iv. Such other, further and different relief as this Court deems just and proper.

XXIII. With respect to the Twenty-third Cause of Action (Negligence):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and

iv. Such other, further and different relief as this Court deems just and proper.

XXIV. With respect to the Twenty-fourth Cause of Action (Conversion):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law; and

iv. Such other, further and different relief as this Court deems just and proper.

XXV. With respect to the Twenty-fifth Cause of Action (Civil Conspiracy):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;

ii. Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;

iv. Punitive damages in an amount to be determined at trial; and

v. Such other, further and different relief as this Court deems just and proper.

XXVI. With respect to the Twenty-sixth Cause of Action (Civil RICO 18 U.S.C. 1962(a)–(c)):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

ii. Pursuant to RICO, reasonable attorney's fees, the costs of suit and all expenses and disbursements incurred in this action;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;

iv. Pursuant to RICO, treble damages in addition to any other damages to which the victim is entitled pursuant to common law or other provisions of the statutory code; and

v. Such other, further and different relief as this Court deems just and proper.

XXVII. With respect to the Twenty-seventh Cause of Action (Civil RICO 18 U.S.C. 1962(d)):

i. Judgment in favor of Plaintiffs and against Defendants, jointly and severally;
Damages in an amount no less than \$200,000,000, the exact amount of which to be determined at trial;

ii. Pursuant to RICO, reasonable attorney's fees, the costs of suit and all expenses and disbursements incurred in this action;

iii. Pre-judgment and post-judgment interest at the maximum rate allowed by law;

iv. Pursuant to RICO, treble damages in addition to any other damages to which the victim is entitled pursuant to common law or other provisions of the statutory code; and

v. Such other, further and different relief as this Court deems just and proper.

JURY DEMAND

Plaintiffs demand trial by jury on all issues and counts so triable.



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November 27, 2018

Attorney for Plaintiffs

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RUDERSDAL, EOOD; ALL SEAS
PROPERTY 2, OOD; ASSET
MANAGEMENT, EAD; and
ZAHARI TOMOV,

Plaintiffs,

-against-

PHILIP ROBERT HARRIS; AYR
LOGISTICS LIMITED, INC.;
ANTHONY DENNIS HARRIOTT;
GRANT CAPITAL INVESTMENTS,
LTD.; FIRST INVESTMENT BANK,
AD; TSEKO TODOROV MINEV;
IVAILO DIMITROV MUTAFCHIEV;
CHAVDAR ANGELOV ANGELOV;
ALL SEAS MANAGEMENT, LTD.;
BLUE FINANCE LIMITED;
DELYAN SLAVCHEV PEEVSKI;
NSN INVESTMENT, EOOD;
BULGARTOBAC HOLDING, AD;
BULGARIAN NATIONAL BANK;
STANISLAV GEORGIEV LYUTOV;
ELENA ZDRAVKOVA
KOSTADINCHEV; TABAK MARKET,
AD; CIBOLE SERVICES
INCORPORATED, BULGARIA, EOOD;
ASTERIA BG, EOOD a/k/a DROSLIAN
BULGARIA, EOOD; VILI VIST, EAD;
PROMISHLENO STROITELSTVO
HOLDING, EAD; THE BANK OF
NEW YORK MELLON CORPORATION;
EATON VANCE STRUCTURED
EMERGING MARKETS EQUITY
FUND, LLC; THE BANK FOR FOREIGN
TRADE OF THE RUSSIAN FEDERATION
a/k/a VTB BANK,

Defendants.

Index No. _____

SUMMONS

Date Index No. Purchased: _____

To the above named Defendants:

PHILIP ROBERT HARRIS

459 Chippendale Drive
Rockwall, TX 75032

AYR LOGISTICS LIMITED, INC.

By: Philip Robert Harris
President and General Manager
459 Chippendale Drive
Rockwall, TX 75032

ANTHONY DENNIS HARRIOTT

21 Foxcroft Drive
Princeton, NJ 08540

**GRANT CAPITAL
INVESTMENTS, LTD.**

By: Anthony D. Harriott
Director
21 Foxcroft Drive
Princeton, NJ 08540

FIRST INVESTMENT BANK, AD

By: Nedelcho Vasilev Nedelchev
Director
37 Dragan Tzankov Boulevard
Municipality Stolichna
Sofia, Bulgaria 1797

TSEKO TODOROV MINEV

20 Dospat Str.
Fl. 4, Ap. 12
Sofia, Bulgaria 1463

IVAILO DIMITROV MUTAFCHIEV

26 Krushova Gradina Str.
Sofia, Bulgaria 1415

CHAVDAR ANGELOV ANGELOV

Tourist Lodge in the
Aladzha Manastir locality
Primorski District
Varna, Bulgaria 9007

ALL SEAS MANAGEMENT, LTD.

By: Registered Agent
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Trust Company of the Marshall Islands, Inc.
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